

BEFORE THE  
POSTAL REGULATORY COMMISSION  
WASHINGTON, D.C. 20268-0001

MAIL PROCESSING NETWORK RATIONALIZATION  
SERVICE CHANGES, 2011

Docket No. N2012-1

**RESPONSE OF THE UNITED STATES POSTAL SERVICE  
TO AMERICAN POSTAL WORKERS UNION INTERROGATORIES  
REDIRECTED FROM WITNESS DAVID WILLIAMS  
(APWU/USPS-T1-6)**

The United States Postal Service hereby files an institutional response to the above-identified interrogatory of the American Postal Workers Union, dated December 29, 2011. The interrogatory has been redirected from witness Williams. The interrogatory is stated verbatim and followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Anthony F. Alverno, Jr.  
Chief Counsel, Global Business

Michael T. Tidwell

475 L'Enfant Plaza West, S.W.  
Washington, D.C. 20260-1137  
(202) 268-2998; Fax -5402  
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**RESPONSE OF THE UNITED STATES POSTAL SERVICE  
TO AMERICAN POSTAL WORKERS UNION INTERROGATORY  
REDIRECTED FROM WITNESS WILLIAMS**

**APWU/USPS-T1-6** Page 7 of your testimony references a “cross-functional Headquarters team.” Please identify by name, title and years of service in that position, each member of the cross-functional team.

**RESPONSE**

Without conceding that such information is relevant to the issues raised by the

Request filed in this docket, below is a list of titles of employees on the team.

The Postal Service considers that their names and years of service in their current positions comprise information equally irrelevant to the issue of whether the service changes under review in this docket are consistent with the applicable policies of title 39, but provides the list of titles in the spirit of cooperation and compromise, and with the objective of minimizing discovery motions practice on matters having no bearing on the Commission's task in this proceeding.

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TO AMERICAN POSTAL WORKERS UNION INTERROGATORY  
REDIRECTED FROM WITNESS WILLIAMS**

**RESPONSE to APWU/USPS-T1-6 (continued)**

<b>Title</b>	<b>Office</b>
SENIOR DIRECTOR	SENIOR DIRECTOR & CHIEF OF STAFF
COUNTERMEASURE DELIVERY/DISTRIBUTION	SENIOR DIRECTOR & CHIEF OF STAFF
MANAGER (MGR), HUMAN RESOURCES (AREA)	HUMAN RESOURCES EASTERN AREA
VICE PRESIDENT (VP), SUPPLY MANAGEMENT	SUPPLY MANAGEMENT VP OFC
MANAGING COUNSEL, CORPORATE & POSTAL BUSINES	CORPORATE POSTAL & BUSINESS LAW
ATTORNEY	CORPORATE POSTAL & BUSINESS LAW
VP, PRODUCT INFORMATION	PRODUCT INFORMATION VP OFC
VP, GOVERNMENT RELATIONS/PUBLIC POL	GOVT RELATIONS/PUB POLCY VP OFC
MANAGER, NETWORK OPERATIONS ENGINEERING	NETWORK OPERATIONS ENGINEERING
MANAGER, OPERATIONS INTEGRATION & SUPPORT	OPERATIONS INTEGRATION & SUPPORT
CHIEF COUNSEL, PRICING & PRODUCT SUPPORT	CORPORATE POSTAL & BUSINESS LAW
VP, EMPLOYEE RESOURCE MANAGEMENT	EMP RESOURCE MGMT VP OFC
VP, DELIVERY & POST OFFICE OPERATIO	DEL & POST OFFICE OPS VP OFCR
VP ,CONSUMER & INDUSTRY AFFAIRS	CONSUMER & IND AFFAIRS VP OFC
MGR, HR SHARED SERVICES	HR SHARED SERVICES
MGR, FIELD COMMUNICATIONS	FIELD COMMUNICATIONS
DEPUTY GENERAL COUNSEL (HQ)	DEPUTY GEN COUNSEL
VP, FINANCE & PLANNING	FINANCE & PLANNING VP OFC
MGR, FINANCE (OPERATIONS)	FINANCE (OPERATIONS)
VP, MAIL ENTRY & PAYMENT TECHNOLOGY	MAIL ENTRY & PYMT TECH VP OFC
MGR, PROCESSING OPERATIONS NATIONAL IMPLEMENTATION COORDINATOR	PROCESSING OPNS NETWORK OPERATIONS
MGR, INDUSTRY ENGAGEMENT & OUTREACH	INDUSTRY ENGAGEMENT & OUTREACH
MGR, COUNTERMEASURE DELIVERY & DISTRIBUTION	COUNTERMEASURE CORPORATE COMMUNICATIONS VP OFC
VP, CORPORATE COMMUNICATIONS	
MGR, CUSTOMER & FIELD PERFORMANCE	CUSTOMER & FIELD PERFORMANCE
VP, DOMESTIC PRODUCTS	DOMESTIC PRODUCTS VP OFC
MGR, NETWORK ANALYTICS	NETWORK ANALYTICS
VP, FACILITIES	FACILITIES VP OFC
MGR, FACILITIES PROGRAM MANAGEMENT	FACILITIES PROGRAM MANAGEMENT CORPORATE POSTAL & BUSINESS LAW
ATTORNEY	
CONSUMER ADVOCATE & MGR CUSTOMER RELATIONS	CONSUMER ADVCT & CUST RELATIONS
VP, LABOR RELATIONS	LABOR RELATIONS VP OFC
VP NETWORK OPERATIONS	NETWORK OPERATIONS VP OFC
MGR, NETWORK DEVELOPMENT & SUPPORT	NETWORK DEVELOPMENT & SUPPORT